

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., et al.,¹

Debtors.

)
) Chapter 11
)
) Case No. 22-11068 (JTD)
)
) (Jointly Administered)
)

**VERIFIED FIRST SUPPLEMENTAL STATEMENT OF SCHULTE ROTH &
ZABEL LLP AND BIELLI & KLAUDER, LLC PURSUANT TO FEDERAL RULE
OF BANKRUPTCY PROCEDURE 2019**

Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Schulte Roth & Zabel LLP (“Schulte”) and Bielli & Klauder, LLC (“BK” and, together with Schulte, “Counsel”) hereby submit the following verified first supplemental statement (this “Verified First Supplemental Statement”) in connection with Counsel’s representation of an ad hoc group of preferred equity holders (collectively and as identified on Exhibit A hereto, the “Preferred Equity Holders”) who hold (whether directly or beneficially through managers or investment advisors, sub-advisors, or managers of discretionary accounts or funds that are holders) the equity interests identified on Exhibit A hereto.

1. As of April 1, 2024, the initial of the Preferred Equity Holders retained Schulte to advise and represent them in connection with the above-captioned chapter 11 cases. On or around August 16, 2024, the Preferred Equity Holders also retained BK as co-counsel to advise and represent them in connection with the above-captioned chapter 11 cases.

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification numbers are 3288 and 4063, respectively. Due to the large number of debtor entities in these chapter 11 cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

2. On August 16, 2024, Counsel filed the *Verified Statement of Schulte Roth & Zabel LLP and Bielli & Klauder, LLC Pursuant to Federal Rule of Bankruptcy 2019* [D.I. 23154] (the “Initial Statement”).

3. Pursuant to Bankruptcy Rule 2019(d), this Verified First Supplemental Statement supplements the information provided in the Initial Statement to reflect changes to the composition of the ad hoc group and updates to each Preferred Equity Holder’s disclosable economic interests, where applicable.

4. The Preferred Equity Holders have indicated to Counsel that they hold and/or own equity interests in relation to the Debtors. In accordance with Bankruptcy Rule 2019, and based upon information provided to Counsel by each of the members of the Preferred Equity Holders, attached hereto as Exhibit A is a revised list of the names, addresses and nature and amount of each member’s equity interests as of the close of business on October 4, 2024 (as certified to Counsel by each member of the Preferred Equity Holders). The information contained in Exhibit A is intended, as of the date hereof, to replace and supersede Exhibit A attached to the Initial Statement. Exhibit A hereto is based upon information provided by each member of the Preferred Equity Holders and is subject to change.

5. As of the date of this Verified First Supplemental Statement, Schulte and BK represent parties in their individual capacities unrelated to the objective of the Preferred Equity Holders in the Chapter 11 Cases. Further, as of the date of this Verified First Supplemental Statement, the members of the Preferred Equity Holders, either collectively or individually, do not represent or purport to represent any other entities in connection with these chapter 11 cases.

6. The undersigned verify that the foregoing is true and correct to the best of their knowledge and belief.

7. Nothing contained in this Verified First Supplemental Statement (or the exhibits hereto) is intended to or should be construed to constitute (a) a waiver or release of any claims filed or to be filed against the Debtors held by the Preferred Equity Holders, their affiliates or any other entity, or (b) an admission with respect to any fact or legal theory. Nothing herein should be construed as a limitation upon, or waiver of, any rights of the Preferred Equity Holders (i) to assert, file and/or amend any proof of interest in accordance with applicable law or (ii) with respect to any orders entered in these cases. The information contained herein is provided solely to comply with Bankruptcy Rule 2019 and is not intended for any other use or purpose.

8. Nothing contained in this Verified First Supplemental Statement is intended or shall be construed to constitute: (a) a waiver or release of the rights of the Preferred Equity Holders to have any final order entered by, or other exercise of the judicial power of the United States performed by, an Article III court; (b) a waiver or release of the rights of the Preferred Equity Holders to have any and all final orders in any and all non-core matters entered only after *de novo* review by a United States District Court Judge; (c) consent to the jurisdiction or authority over any final decision of this court over any matter related to these chapter 11 cases; (d) an election of remedy; (e) a waiver or release of any rights the Preferred Equity Holders may have to a jury trial; (f) waiver or release of the right to move to withdraw the reference with respect to any matter or proceeding that may be commenced in the chapter 11 cases against, or otherwise involving, the Preferred Equity Holders; or (g) a waiver or release of any other rights, claims, actions, defenses, setoffs, or recoupments to which the Preferred Equity Holders, or any member thereof, is or may be entitled, in law or in equity, under any agreement or otherwise, with all such rights, claims, actions, defenses, setoffs, or recoupments being expressly reserved.

9. Counsel reserves the right to amend or supplement this Verified First Supplemental Statement in accordance with the requirements of Bankruptcy Rule 2019 and any additional information that may become available throughout the course of these chapter 11 cases.

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Dated: October 6, 2024

Respectfully submitted,

/s/ David M. Klauder

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